



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Mary Rose Jennison, Treasurer  
NRA/Political Victory Fund  
11250 Waples Mill Road  
Fairfax, VA 22030

APR 23 1997

Identification Number: C00053553

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

Dear Ms. Jennison:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule E discloses independent expenditures on behalf of federal candidates (pertinent portion(s) attached). Schedule B of a previous report disclosed in-kind contributions on behalf of some of these same candidates. Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:  
... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The coordination involved in making an in-kind contribution to a candidate may preclude your committee from making an independent expenditure in support of the same candidate. Under 11 CFR §109.1(c), any expenditure which does not qualify as an independent expenditure is considered an in-kind contribution. Please amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page), or provide additional clarifying information concerning the independent expenditures made in support of Andrea Seastrand.

*Celebrating the Commission's 20th Anniversary*

YESTERDAY, TODAY AND TOMORROW  
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